

THE HONORABLE BRIAN D. LYNCH
Chapter 11
Hearing Date: January 18, 2018
Hearing Time: 9:30 a.m.
Response Date: January 11, 2018
Location: Tacoma, Courtroom I

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

In Re

OLYMPIA OFFICE LLC,

Debtor.

No. 17-44721-BDL

AMENDED NOTICE OF HEARING ON:

1) MOTION FOR RELIEF FROM STAY
OR TO DISMISS

2) MOTION FOR CONTINUANCE OF
DEBTOR'S MOTIONS: (1) TO (a)
TERMINATE THE ENGAGEMENT OF
JSH PROPERTIES, INC., AND DIRECT
THE RECEIVER TO TURN OVER TO
THE DEBTORS (i) POSSESSION AND
CONTROL OF THE DEBTORS'
PROPERTIES, (ii) CASH IN THE JSH
ACCOUNTS RELATED TO THE
PROPERTIES; AND (iii) BOOKS AND
RECORDS RELATED TO
PROPERTIES; AND (b) AUTHORIZING
THE DEBTORS TO REMIT
PAYMENTS TO BE APPLIED TO
DEBTOR-IN-POSSESSION
FINANCING OR THE NOTE "A"
PRINCIPAL AMOUNT; AND (2) TO
EXTEND AUTOMATIC STAY

\\

AMENDED NOTICE OF HEARING - 1

130395.0002/7176932.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 TO: Clerk of the United States Bankruptcy Court;
2 AND TO: United States Trustee;
3 AND TO: All Creditors and Parties-in-interest.

4 **PLEASE TAKE NOTICE** that a hearing on the following motions (together the
5 “**Motions**”) filed by MLMT 2005-MCP1 Washington Office Properties, LLC (“**Noteholder**”),
6 in the above-referenced case, will be held in front of the Honorable Brian D. Lynch as detailed
7 below:

8 1) Motion under Bankruptcy Code Sections 105, 362(d)(1), 362(d)(2), 362(d)(4)
9 and 1112(b) for Relief from the Automatic Stay or in the alternative for Dismissal of
10 Bankruptcy Case (“**Motion for RFS/or Dismissal**”). The Motion for RFS/or Dismissal is
11 supported by the Declaration of David Bornheimer.

12 2) Motion for Continuance of Debtor’s Motions: (1) to (a) Terminate the
13 Engagement of JSH Properties, Inc., and Direct the Receiver to Turn Over to the Debtors (i)
14 Possession and Control of the Debtors’ Properties, (ii) Cash in the JSH Accounts Related to
15 the Properties; and (iii) Books and Records Related to Properties; and (b) Authorizing the
16 Debtors to Remit Payments to be Applied to Debtor-In-Possession Financing or the Note “A”
17 Principal Amount; and (2) to Extend Automatic Stay (“**Motion to Continue**”), requesting that
18 the Court continue the hearing on Debtor’s Motions from January 24, 2018, to February 14.
19 The Motion to Continue is supported by the Declaration of Alan Feld.

20 **AMENDED HEARING DATE AND TIME/OBJECTION DEADLINE**

21 PLEASE TAKE NOTICE that a hearing on the Motions (detailed above) will take
22 place as follows:

23 Hearing Date: January 18, 2018
24 Hearing Time: 9:30 a.m.

25 Hearing Location: Tacoma Federal Courthouse
26 Union Station
1717 Pacific Avenue, Courtroom I
Tacoma, WA 98402

Response Date: January 11, 2018

AMENDED NOTICE OF HEARING - 2

130395.0002/7176932.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 Copies of the Motions and supporting declarations thereto can be obtained by
2 contacting Karly Stevens, Lane Powell PC, 1420 Fifth Avenue, Suite 4200, Seattle, WA,
3 98101, telephone (206) 223-3988, email: stevensk@lanepowell.com.

4 PLEASE TAKE FURTHER NOTICE that any party wishing to object to one or all of
5 the Motions must file a written objection with the Clerk of the Court, United States
6 Bankruptcy Court, 1717 Pacific Avenue, Suite 2100, Tacoma, WA 98402, and serve a copy
7 of said objection on the undersigned counsel at the address listed below, no later than
8 **Thursday, January 11, 2018**. If you object, you must also attend the hearing.

9 PLEASE TAKE FURTHER NOTICE that if no timely objection to any one or all of
10 the Motions is filed, the Court may, in its discretion, grant the Motions prior to hearing without
11 further notice.

12 DATED: January 5, 2018

13 LANE POWELL PC

14
15 By /s/ Charles R. Ekberg
16 Charles R. Ekberg, WSBA No. 00342
17 James B. Zack, WSBA No. 48122
18 Attorneys for MLMT 2005-MCP1 Washington
19 Office Properties, LLC

20 SHEPPARD, MULLIN, RICHTER &
21 HAMPTON LLP

22 By /s/ Alan M. Feld
23 Alan M. Feld, *pro hac vice*
24 Attorneys for MLMT 2005-MCP1 Washington
25 Office Properties, LLC
26

AMENDED NOTICE OF HEARING - 3

130395.0002/7176932.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107